#### SULLIVAN, MOUNTJOY, STAINBACK & MILLER PSC

ATTORNEYS AT LAW

Ronald M. Sullivan
Jesse T. Mountjoy

Frank Stainback

James M. Miller

Michael A. Fiorella

Allen W. Holbrook R. Michael Sullivan

Bryan R. Reynolds\*

Tyson A. Kamuf

Mark W. Starnes

Mark W. Starnes
C. Ellsworth Mountiov

\*Also Licensed in Indiana

August 28, 2013

#### Via FedEx Overnight Delivery

Mr. Jeff Derouen Executive Director

Public Service Commission of Kentucky

211 Sower Boulevard

P.O. Box 615

Frankfort, Kentucky 40602-0615

#### In the Matter of:

Application of Big Rivers Electric Corporation for a General Adjustment in Rates - Case No. 2013-00199

Dear Mr. Derouen:

Enclosed for filing on behalf of Big Rivers Electric Corporation ("Big Rivers") are an original and ten (10) copies of its <u>Revised</u> response to page 1 of 3 of the attachment accompanying Tab 50 of its Application, which was filed on June 28, 2013.

Please confirm the Commission's receipt of this information by having the Commission's date stamp placed on the enclosed additional copy and returning to Big Rivers in the self-addressed, postage paid envelope provided.

I certify that on this date, a copy of this letter and a copy of the revised response were served by first class mail on the persons listed on the attached service list.

Should you have any questions about this matter, please contact me.

Sincerely yours,

Tyson Kamuf

cc:

Counsel for Big Rivers Electric Corporation

Telephone (270) 926-4000 Telecopier (270) 683-6694 Service List

Billie J. Richert

100 St. Ann Building
PO Box 727
Wensboro, Kentucky
42302-0727

www.westkylaw.com

#### Service List PSC Case No. 2013-00199

Jennifer B. Hans Lawrence W. Cook Assistant Attorneys General 1024 Capital Center Dr. Suite 200 Frankfort, KY 40601

Mr. David Brevitz 3623 SW Woodvalley Terrace Topeka, KS 66614

Mr. Bion C. Ostrander 1121 S.W. Chetopa Trail Topeka, KS 66615

Mr. Larry Holloway 830 Romine Ridge Osage City, KS 66523

Michael L. Kurtz, Esq. Kurt J. Boehm, Esq. Boehm, Kurtz & Lowry 36 E. Seventh St., Suite 1510 Cincinnati, Ohio 45202

G. Kelly Nuckols President and CEO Jackson Purchase Energy Corporation 2900 Irvin Cobb Drive P.O. Box 4030 Paducah, KY 42002-4030

Melissa D. Yates Denton & Keuler, LLP 555 Jefferson Street Suite 301 Paducah, KY 42001

Burns Mercer Meade County RECC 1351 Hwy. 79 P.O. Box 489 Brandenburg, Kentucky 40108 Thomas C. Brite, Esq. Brite & Hopkins, PLLC 83 Ballpark Road Hardinsburg, KY 40143

Gregory Starheim
President & CEO
Kenergy Corp.
3111 Fairview Drive
P.O. Box 1389
Owensboro, KY 42302-1389

J. Christopher Hopgood, Esq. 318 Second Street Henderson, Kentucky 42420

Joe Childers
Joe F. Childers & Associates
300 Lexington Building
201 West Short Street
Lexington, Kentucky 40507

Shannon Fisk Senior Attorney Earthjustice 1617 John F. Kennedy Blvd., Suite 1675 Philadelphia, PA 19103

Thomas Cmar Earthjustice 5042 N. Leavitt Street, Suite 1 Chicago, IL 60625

Kristin Henry Staff Attorney Sierra Club 85 Second Street San Francisco, CA 94105 David O'Brien Suetholz Neal B. Hayes Kircher Suetholz & Grayson PSC 515 Park Avenue Louisville, KY 40208

#### BIG RIVERS ELECTRIC CORPORATION

#### APPLICATION OF BIG RIVERS ELECTRIC CORPORATION FOR A GENERAL ADJUSTMENT IN RATES CASE NO. 2013-00199

#### **VERIFICATION**

I, Billie J. Richert, verify, state, and affirm that I prepared or supervised the preparation of the revised application exhibit filed with this Verification, and that that exhibit is true and accurate to the best of my knowledge, information, and belief formed after a reasonable inquiry.

COMMONWEALTH OF KENTUCKY ) COUNTY OF HENDERSON

SUBSCRIBED AND SWORN TO before me by Billie J. Richert on this the 21th day of August, 2013.

Paula Mitchell Notary Public, Ky. State at Large

My Commission Expires 1-12-17

# **ORIGINAL**



Your Touchstone Energy® Cooperative

#### COMMONWEALTH OF KENTUCKY

#### BEFORE THE PUBLIC SERVICE COMMISSION OF KENTUCKY

In the Matter of:

APPLICATION OF BIG RIVERS	)	
ELECTRIC CORPORATION FOR A	)	Case No. 2013-00199
GENERAL ADJUST IN RATES	)	

<u>Revised</u> Response to the Big Rivers' Application Tab 50 originally filed June 30, 2013

FILED: August 29, 2013

**ORIGINAL** 

#### Big Rivers Electric Corporation Case No. 2013-00199

## Forecasted Test Period Filing Requirements (Forecast Test Year 12ME 01/31/2015; Base Period 12ME 09/30/2013)

1	Tab No. 50- July 12, 2013
2	<i>Revised</i> Tab No. 50 - August 29, 2013
3	Filing Requirement
4	807 KAR 5:001 Section 16(13)(g)
5	Sponsoring Witness: Billie J. Richert

6 7

11

12

13

14

15

16

17

18

19

20

#### <u>Description of Filing Requirement:</u>

An analysis of payroll costs including schedules for wages and salaries,
employee benefits, payroll taxes, straight time and overtime hours, and
executive compensation by title.

#### Response:

Big Rivers' <u>revised</u> page 1 of 3 from the previously filed schedule of salaries and wages, employee benefits, payroll taxes, straight time and overtime hours, and executive compensation by title is included as an attachment to this response.<sup>1</sup>,<sup>2</sup> In reviewing the schedule filed with its application on June 30, 2013, Big Rivers discovered that it inadvertently had excluded Paid Time Off (PTO) time in Straight-time Salaries and Wages, and FAS 12 Costs in Medical Insurance from page 1 of 3. The attached <u>revised</u> schedule for page 1 of 3 corrects these omissions.

Big Rivers' straight time dollars and hours include straight time worked and paid time off benefits for vacation, holiday, sick and personal time.

Big Rivers' forecast assumes each employee will have 2,080 hours of straight time and paid time off per year. Big Rivers does not forecast overtime hours; instead Big Rivers forecasts overtime dollars by applying a factor to straight time.

### Big Rivers Electric Corporation Case No. 2013-00199

## **Revised** Analysis of Payroll Costs

Description of Expenditure	Historical Base Period Oct-12 to Mar-13	Forecasted Base Period Apr-13 to Sept-13	Base Period Total Oct-12 to Sept-13	Forecasted Test Period Feb-14 to Jan-15
Wages and Salaries -				
Straight-time	\$20,914,498	\$22,306,589	\$43,221,087	\$34,602,082
Overtime	\$3,141,766	\$2,799,886	\$5,941,652	\$3,892,208
<b>Total Wages and Salaries</b>	\$24,056,264	\$25,106,475	\$49,162,739	\$38,494,290
Employer Payroll Taxes -				
F.I.C.A.	\$1,780,582	\$1,909,687	\$3,690,269	\$2,899,468
Federal & State Unemployment Taxes	\$29,755	\$64,237	\$93,992	\$96,896
Total Payroll Taxes	\$1,810,337	\$1,973,924	\$3,784,261	\$2,996,364
Employee Benefits (Employer portion)				
401k Plan	\$576,594	\$778,087	\$1,354,681	\$1,188,120
Dental Insurance	\$207,068	\$220,002	\$427,070	\$335,939
Group Life Insurance	\$131,837	\$138,077	\$269,914	\$210,842
Long Term Disability Insuarnce	\$170,743	\$214,757	\$385,500	\$247,170
Medical Insurance	\$3,703,638	\$4,436,190	\$8,139,828	\$6,774,007
Post Retirement Medical	\$564,563	\$733,999	\$1,298,562	\$1,107,106
Pension	\$4,024,566	\$4,041,755	\$8,066,321	\$4,172,459
Workers Compensation	\$331,922	\$373,830	\$705,752	\$567,750
Total Employee Benefits	\$9,710,931	\$10,936,697	\$20,647,628	\$14,603,393
Grand Total	\$35,577,532	\$38,017,096	\$73,594,628	\$56,094,047
Straight Time Hours	617,737	651,382	1,269,119	965,825
Overtime Hours	64,671		64,671	

Case No. 2013-00199

Revised Tab 50 - 807 KAR 5:001 Section 16(13)(g)

Sponsoring Witness: Billie J. Richert

Page 1 of 3